



February 23, 2016

By Electronic Comment Filing System (ECFS)

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

EB Docket No. 06-36

Re: CERTIFICATION OF CPNI COMPLIANCE FILING – February 23, 2016

Mountain View Telephone Company, Inc. 499 Filer ID # 805875

Dear Ms. Dortch:

Please find the attached CPNI Certification together with our statement of procedures for operational compliance with the FCC's CPNI rules.

Should you have any questions, please feel free to contact me at 870-425-3100.

Sincerely,

A handwritten signature in blue ink that reads "Lang Zimmerman". The signature is fluid and cursive, written over the printed name.

Lang Zimmerman
Vice President
langz@mtnhome.com

Attachments

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for: 2015

Date Filed: 02/23/16

Name of Company covered by this certification: **Mountain View Telephone Company, Inc.**

Form 499 Filer ID: **805875**

Name of signatory: **Lang Zimmerman**

Title of signatory: **Vice President**

I, **LANG ZIMMERMAN**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in §64.2001 *et seq.*, the Commission's CPNI rules.

The company has not taken any actions against data brokers in the past year. The company has not instituted proceedings or filed petitions at the Commission, any state commission, or with any state or federal court system against data brokers. The Company understands it must report on any information that it has with respect to the processes that pretexters are using to attempt to access CPNI, and what steps the company is taking to protect CPNI, including the Company's duty to "provide explanation of any actions taken against data brokers". The Company continues to monitor and watch for unauthorized access.

The company has not received any customer complaints in the past year concerning the unauthorized release or disclosure of CPNI. If complaints had been received, the number of complaints would have been broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information. A complete breakdown would have been provided and full compliance with this request will be maintained. Due to no such complaints or violations, no breakdown is provided.

Signed:


LANG ZIMMERMAN, Vice President

Statement of CPNI Compliance Procedures
Of
Mountain View Telephone Company

The policy of the Company is to comply with both the letter and spirit of all laws of the United States, including those pertaining to CPNI contained in § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's regulations, 47 CFR 64.2001-.2009. The Company's policy is to rely on the involvement of high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred. Special training of all employees with CPNI access is also a priority.

The FCC's regulations, 47 CFR 64.2009, require the Company to implement a system to clearly establish the status of a customer's CPNI approval prior to the use of CPNI, and to train its personnel as to when they are, and are not, authorized to use CPNI, and to have an express disciplinary process in place. The Company has compiled a manual, which constitutes the Company's policies and procedures related to CPNI. The law and regulations are a part of the manual. All employees are required to follow the policies and procedures specified in this Manual. The Company's employees have received training on these policies and procedures. The Company's management has been trained to ensure that strict compliance to this manual is achieved. The Company's operating procedures ensure compliance with the CPNI rules, which include new carrier authentication requirements, a requirement to notify customers of account changes, and a requirement to notify both law enforcement and customers in the event of a CPNI breach.

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

The Company places an emphasis on CPNI protection and compliance. Training and teamwork on CPNI compliance are a focus in staff meetings.